

REMARKS

INTRODUCTION

In accordance with the foregoing, no claims have been canceled or amended. Claim 15 has been added. No new matter is being presented, and approval and entry are respectfully requested.

Claims 1-9 and 14-15 are pending and under consideration. Reconsideration is respectfully requested.

REJECTION UNDER 35 U.S.C. §102

In the Office Action, at page 2, claims 1-9 and 14 were rejected under 35 U.S.C. §102 in view of U.S. Patent No. 6,487,472 issued to Song et al. This rejection is traversed and reconsideration is requested as Song fails to teach or suggest:

diagnosing an operational state of the plurality of sub-modules
prior to beginning the semiconductor device manufacturing
process

as recited in independent claim 1.

The Examiner appears to admit that Song fails to disclose diagnosing an operational state prior to beginning *the* semiconductor device manufacturing process. Instead, the Examiner takes the position that by repeating the process of Song over and over, an operational state of the plurality of sub-modules is diagnosed prior to beginning a next semiconductor manufacturing process. However, this is not what is recited by claim 1. What is recited is "diagnosing... prior to beginning *the* device manufacturing process." That is, the Applicants respectfully submit that there is a distinction between diagnosing prior to a next process and prior to diagnosing prior to beginning the process.

The Applicants respectfully submit that since Song fails to teach or suggest all of the features of claim 1, this claim is allowable over Song. Thus, withdrawal of the 102 rejection is respectfully requested.

Regarding the rejection of claims 2-9 and 14, these claims depend directly or indirectly on independent claim 1, and are therefore believed to be allowable for at least the reasons noted above.

NEW CLAIM

New claim 15 is directed to a process control method managing a first semiconductor device manufacturing process. Claim 15 recites:

diagnosing an operational state of the plurality of sub-modules
prior to beginning the first semiconductor device manufacturing
process.

Therefore, it is submitted that claim 15 patentably distinguishes over the prior art.

CONCLUSION

In accordance with the foregoing, it is respectfully submitted that all outstanding objections and rejections have been overcome and/or rendered moot. And further, that all pending claims patentably distinguish over the prior art. Thus, there being no further outstanding objections or rejections, the application is submitted as being in condition for allowance which action is earnestly solicited.

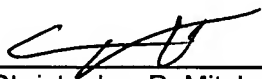
If the Examiner has any remaining issues to be addressed, it is believed that prosecution can be expedited by the Examiner contacting the undersigned attorney for a telephone interview to discuss resolution of such issues.

If there are any underpayments or overpayments of fees associated with the filing of this Amendment, please charge and/or credit the same to our Deposit Account No. 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

Date: FEB 10, 2006

By: 
Christopher P. Mitchell
Registration No. 54,946

1201 New York Ave, N.W., Suite 700
Washington, D.C. 20005
Telephone: (202) 434-1500
Facsimile: (202) 434-1501